

## **Attachment: PSR Guidance for Service Notes**

### **Psychosocial Rehabilitation Services: Change in Frequency of Entering Service Notes:**

CMS has granted approval for Psychosocial Rehabilitation [PSR] services to be documented in the service record on a weekly basis. Effective, as of March 1, 2010, PSR services will continue to be documented on a full service note, but may be done on a weekly basis instead of per date of service. This means that the guidance contained in this Implementation Update supersedes the section on page 8-8, as well as on page 10-11, in the *DMH/DD/SAS Records Management and Documentation Manual [RM&DM]* that specifically requires a service note per date of service for PSR.

With this new allowance, there must also be clear guidance to assist PSR providers in meeting the requirements for documenting progress on a less frequent basis. Reminder: PSR still requires a full service note, which must meet the requirements outlined in the *RM&DM* on page 8-5. The *RM&DM* already has information that describes how services are to be documented in the record when the frequency requirements are less than per date of service, and certain excerpts have been taken from the *RM&DM* to assist PSR provider agencies in meeting the requirements. **Note: Where the *RM&DM* references monthly or quarter notes, it also applies to weekly notes.**

Clarification: In order to meet the timely documentation requirements, weekly documentation requires PSR provider agencies to enter each full service note within 24 hours of the close of the service period, which in the case of PSR, would typically be designated as the last day of the week, but could be a different closing date, depending on the day of the week that has been designated by the provider agency. In order to meet this requirement, each service note must be entered into the service record within 24 business hours of the designated closing period. The designated close of the service period [e.g., “every Friday”] for PSR must be specified in the provider agency’s policy and procedures manual.

*Example: If the PSR provider agency has designated Fridays as being the close of the service period, then the expectation is that the service notes for PSR would be entered in the service record every Friday, but no later than 24 hours [business days] of the close of the service period, which would be the following Monday, if the agency does not operate on weekends, in order for the note to be considered timely; otherwise, the note would have to be treated as a late entry per the RM&DM.*

It is also required that the attendance record for each person enrolled in the PSR service be clearly documented in the service record.

Outlined below are additional *RM&DM* requirements that apply to the documentation of PSR:

From page 8-1: **Documenting Service Provision in a Service Note or Grid:** ...For some services where the frequency requirement for documentation of progress spans a range of time, e.g., monthly or quarterly, and/or where one or more service providers within the same team/agency have carried out the same discrete service for an individual on different days, then the Qualified Professional or other designated staff [one of whom directly provided the service during the time frame in which the service was provided] is responsible for gathering all the relevant information from the other staff on the team and writing and signing a composite service note that outlines the individual’s progress during that service period. Such documentation of progress must be based on the individualized goals that were the focus of intervention for the time period being addressed in the service note.

From page 8-2: **Timely Documentation and Late Entries for Service Notes and Grids:** ...Timely documentation is essential to the integrity of the service record and for meeting reimbursement requirements of funding sources. Late entries and missing documentation can cause numerous problems for agencies and should be avoided. Late entries are defined as those which are entered after the required time frame for documentation has expired...

There are a few day/night and twenty-four hour services, where the requirement is that certain categories of service notes, i.e., monthly notes or quarterly notes, are written or dictated on the closing date of a specified

service period, or within twenty-four hours of the close of the service period. In these situations, timely documentation is evidenced by service notes that are written or dictated within these parameters.

From page 8-4: Day/Night Services Requiring Monthly or Quarterly Service Notes: When the frequency requirement for a day/night service is a monthly or quarterly note, the completion of a service note to reflect the services provided within the month or quarter shall be documented at the close of the service period, i.e., on the last day of the service period, or within twenty-four hours of the close of the service period, in order to be considered timely documentation. Any service note or grid written or dictated after twenty-four hours from the close of the service period is considered a late entry and must include the applicable documentation requirements below:

1. Each note shall be labeled as a “late entry” and shall include the date the documentation was made and the date that the documentation should have been entered, i.e., closing date of service period. For example, “Late Entry made on 8/4/08 for service period ending July 31, 2008.”
2. The late entry service note requires a dated signature.

If an electronic health record is used and late entries are tracked/stamped in the system, the procedures for labeling late entries as outlined above are not required.

From page 8-7: **Service Notes When Provided by a Team:** When the same discrete service is provided to an individual by more than one staff member at the same time, as in the case of certain teams, such as ACTT or Day Treatment, etc., one of the members of the team who provided the service may write and sign the service note. The service note must include the other participating staff members involved and describe their role in providing the service. While it may be prudent to have the other participating staff sign the note, there is no state requirement to do so.

**Frequency and Other Requirements for Entering Service Notes:** The frequency requirements for service notes are largely determined based on the type of service that was provided. However, in all cases, service notes shall be made more frequently than the requirements outlined below when necessary to indicate significant changes in the individual’s status, needs, or changes in the PCP. When the frequency requirement for documentation of progress spans a range of time [e.g., monthly or quarterly], and one or more service providers within the same team/agency have carried out the same service to the individual on different days, then the Qualified Professional or other designated staff [one of whom directly provided the service during the time frame in which the service was provided] is responsible for gathering all the relevant information from other providers on the team and writing and signing a composite service note that outlines the individual’s progress during that time period. Such documentation of progress must be based on the individualized goals that were the focus of intervention for the time period being addressed in the service note.

From pages 8-8 to 8-9: **Day/Night Services:** A day/night service is defined as a service provided on a regular basis, in a structured environment that is offered to the same individual for a period of three or more hours within a twenty-four hour period [APSM 30-1, Rules for MH/DD/SA Facilities and Services]. The minimum frequency requirements for entering service notes vary among the different services within the day/night category.

...Documentation of day/night services shall be entered in the service record following the required elements noted above in *Contents of a Service Note*. The date(s) of attendance shall also be documented in the service record for day/night services...

...For day/night services...reported/billed in 15-minute increments, the total amount of time spent performing the service per day must be documented in the service record. This information may be indicated with the attendance information or included in the...service note.

If the duration of services is less than the above noted frequency, a service note shall be documented for the period of time that the individual received the service...